



CIVIL LIBERTIES
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October 20, 2020

VIA ECF

Honorable Loretta A. Preska
U.S. District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: *United States v. Steven Donziger*, No. 19-CR-561 (LAP); 11-CIV-691 (LAK)

Dear Judge Preska:

Amendment to previously disclosed defense witnesses:

Instead of calling Patricio Salazar as a witness, we are requesting the testimony of his brother, Agustin Salazar, Attorney at Law.

This defense witness is a voluntary witness willing to appear in the SDNY for trial on or about November 6-11, 2020.

However, due to the global COVID-19 pandemic, travel to the U.S is prohibited for health reasons. Ecuador is currently at level 3 out of 4 on the COVID risk scale (avoid non-essential travel). Mr. Salazar would be required to quarantine for two weeks in New York, and then for two weeks upon his return to Ecuador. As a practicing attorney, he cannot cease his professional obligations for a month in order to testify during a global pandemic.

Further, my office has continued to attempt to contact the U.S. embassy in Ecuador's capital of Quito. The offices of the U.S. embassy are closed except for U.S. citizen emergencies or deaths.

Sincerely,

/s/ Lauren C. Regan (electronic signature)

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